

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Marco M. Santini	:	Chapter 13
Dorothy P. Santini	:	Case No.: 18-17067-ELF
Debtor	:	

**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY
FREE AND CLEAR OF LIENS AND ENCUMBRANCES**

Debtors, Marco M. and Dorothy P. Santini, by and through the undersigned counsel, bring this Expedited Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof aver as follows:

1. Debtors commenced the instant Chapter 13 matter on October 25, 2018 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on July 11, 2019.
3. The subject real property is located at 4003 Garrett Road, Drexel Hill, Pennsylvania (hereinafter referred to as “the property”) and is owned by the Debtors.
4. Debtors believe it to be in their best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Michael Mulholland of Long and Foster Real Estate.
6. On or about December 15, 2021, Debtors, by and through their realtor entered into an Agreement of Sale of the property in the amount of \$295,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**

7. The settlement date for the sale of the subject property is scheduled for January 14, 2022 and therefore an expedited hearing is humbly requested.

8. The Buyer, Eboney Williams, is not an insider of the Debtors and the sale represents and arms-length transaction between the parties made without fraud and/or collusion.

9. From the sale proceeds the Debtors intend to satisfy the mortgage serviced by Penny Mac Loan Servicing along with any other liens on the property.

10. The Debtors are desirous of receiving their full exemption in the sum of \$47,350.00 from the sale proceeds plus any remaining sale proceeds after all liens and the Chapter 13 Balance is satisfied.

WHEREFORE, Debtors, respectfully request that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtors to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtors such other and further relief to which they may be justly entitled.

Dated: December 20, 2021

/s/Brad J. Sadek, Esq.
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